

EXHIBIT A

WHEREAS, the parties have met, conferred, and agreed—without conceding that any sum is owed, or will be owed, to Plaintiffs or that Plaintiffs are legally entitled to such an award against Defendants—that it would be unnecessary to engage in motion practice or other dispute over costs and fees at this preliminary stage, since subsequent developments may bear upon the parties’ respective positions.

WHEREAS, out of an abundance of caution and for the sake of obviating any procedural dispute or uncertainty, the parties therefore STIPULATE as follows:

Pursuant to Local Rule CV-54, Plaintiffs’ Application for Costs and Fees, inclusive of those related to this Court’s Order of preliminary relief (Dkt. #43), shall be due 14 days after entry of Final Judgment unless another date is mutually agreed upon by the parties in writing.

DATED: September 25, 2023

HAYNES BOONE, LLP

By: /s/ Laura Lee Prather

Laura Lee Prather
Attorney for Plaintiffs

DATED: September 25, 2023

OFFICE OF THE TEXAS ATTORNEY
GENERAL

By: /s/ Christina Cella

Christina Cella
Assistant Attorney General Attorney for
Defendants